IN OPEN COURT

APR 8 2018

CLERK, U.S. DISTRICT COURT
NORFOLK, VA

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

IN RE:	)	**UNDER SEAL**
	)	
	)	
GRAND JURY PROCEEDINGS	)	**CASE NUMBER 2:18cr** 62

MOTION TO SEAL INDICTMENT

The United States of America, by and through its attorneys, Tracy Doherty-McCormick, Acting United States Attorney for the Eastern District of Virginia, and Alan M. Salsbury, Assistant United States Attorney, and Andrew C. Bosse, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the indictment and arrest warrant in this case.

Sealing is necessary to avoid notification of the existence of the arrest warrant, which could result in flight from prosecution, the destruction of or tampering with evidence, the intimidation of potential witnesses, jeopardize the safety of the arresting officers or otherwise jeopardize the investigation. Another procedure will not adequately protect the needs of law enforcement at this time.

Such sealing is within the discretion of this Court and may be granted "for any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also, Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

The United States requests that the indictment and arrest warrant remain under seal until the arrest of the defendant, at which time the indictment may be treated as a matter of public record.

The United States further requests that: (1) a certified copy of the indictment be provided to those law enforcement officials involved in the prosecution of this case; and (2) a copy of the sealed arrest warrant be made available to agents of the Federal Bureau of Investigation for execution.

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